

foreign or international tribunal or ‘any interested person.’” *In re Edelman*, 295 F.3d 171, 175-76 (2d Cir. 2002). Specifically, Mr. Azima is an “interested person” as the counterclaim plaintiff in the UK proceeding; Mr. Azima seeks this discovery for use in a proceeding pending before a foreign tribunal, the UK Court; and JPMorgan is headquartered in the Southern District of New York.

In addition, the four discretionary factors identified by the United States Supreme Court in *Intel Corp. v. Advanced Micro Devices, Inc.*, 542 U.S. 241, 264-65 (2004), all weigh in favor of granting this Application. JPMorgan is not a party to the proceedings before the UK Court; the UK Court is not opposed to this form of discovery; Mr. Azima is not concealing an attempt to circumvent the requirements of the UK Court; and the discovery sought is narrowly tailored so as not to be unduly burdensome to JPMorgan.

Thus, Mr. Azima respectfully requests this Court to enter an order:

1. Granting Mr. Azima’s Application for discovery from JPMorgan pursuant to 28 U.S.C. § 1782; and
2. Authorizing Mr. Azima to issue a subpoena in substantially the same form as the draft attached.

Respectfully submitted,

Dated: March 9, 2022

/s/ Calvin Lee
Calvin Lee
Miller & Chevalier Chartered
900 16th Street, N.W.
Washington, D.C. 20006
Telephone: (202) 626-5800
Fax: (202) 626-5801
E-mail: clee@milchev.com

CERTIFICATE OF SERVICE

I hereby certify that on March 9, 2022, I caused a true and correct copy of (1) Farhad Azima's Application for Order to Take Discovery Pursuant to 28 U.S.C. § 1782 and accompanying documents sent via Federal Express overnight delivery to the following addresses:

JPMORGAN CHASE & CO.
383 Madison Avenue
New York, NY, 10017

/s/ Calvin Lee
Calvin Lee